

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

DAWARI DAN-HARRY on behalf of
himself and all others so similarly situated,

Plaintiff,

vs.

PNC BANK. N.A.,

Defendant.

CA NO. 1:17-CV-136

**DECLARATION OF ATTORNEY TODD S. DION IN OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Todd S. Dion, Esq., pursuant to 28 U.S.C. 1746 hereby declares as follows:

1. I am the attorney for Plaintiff, Dawari Dan-Harry in this action. As such, I am familiar with the facts set forth below, which are true to the best of my knowledge and after conducting reasonable inquiries and based upon the documents referenced that I have reviewed in connection to this matter.
2. I respectfully submit this declaration in opposition to the Defendants' Motion for Summary Judgment and place before the Court the following exhibits referenced in Plaintiff's memorandum of law, affidavit and response to Defendants statement of material facts.
3. Attached as Exhibit 1 is the tracking search results from the USPS website tracking tool of the purported face-to-face meeting letter set forth in Defendant's Declaration of PNC Bank In Support of the Motion for Summary Judgment of PNC Bank and identified as Exhibit 1 of such Declaration.

4. Attached as Exhibit 2 is the Massachusetts Western Housing Court decision of Freedom Mortgage Corp v. Newsome (12-SP-2461 September 1, 2017) that the Plaintiff references in his Memorandum of Law In Support of His Opposition to Defendant's Motion for Summary Judgment at pages 9, 10 and 11.

Dated August 8 2018

/s/ Todd S. Dion, Esq.
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CERTIFICATE

I, Todd S. Dion, hereby certify that this document frilled through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on August 8, 2018.

/s/ Todd S. Dion